

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Deidre R. Jones,

Debtor.

Case No. 24-11307

Chapter 13

Debtor's Motion to Extend the Automatic Stay

AND NOW, Debtor Deidre R. Jones, by and through their attorney, moves this Court for an order extending the automatic stay under 11 U.S.C. § 362(c)(3)(B). In support of this motion, the Debtor states as follows:

1. The Debtor filed this case under chapter 13 on April 17, 2024.
2. The trustee in this case is Scott F. Waterman.
3. The Debtor has filed a chapter 13 plan and all statements, schedules, and related documents as required by Fed. R. Bankr. P. 1007(b).
4. The Debtor filed Case No. 23-11740 in the District of Delaware under chapter 13 on October 17, 2023, which was dismissed on February 29, 2024 for failure to file information. The Debtor represented herself in that case.
5. The Debtor filed Case No. 23-10257 in the District of Delaware under chapter 13 on February 14, 2024, which was dismissed on March 7, 2024 for failure to file information. The Debtor represented herself in that case.
6. The Debtor had two bankruptcy cases pending in the one-year period immediately preceding the petition date in this case, and consequently, the automatic stay is set to expire thirty days after the instant case was filed. 11 U.S.C. § 362(c)(3)(A).
7. The Court may extend the automatic stay upon notice, hearing, and a showing that the instant case was filed in good faith. 11 U.S.C. § 362(c)(3)(B). A case is filed in good faith when there are positive changing circumstances showing that a debtor can successfully see a chapter 13 through to the end. *In re Legree*, 285 B.R. 615, 620 (Bankr. E.D. Pa. 2002).

8. This case was filed in good faith. The debtor's previously tumultuous personal circumstances have been resolved as of the filing of the instant case, granting her the opportunity and ability to complete a successful chapter 13 bankruptcy.

9. Because this case was filed in good faith, the Court must continue the automatic stay against all creditors for the duration of this case.

NOW, THEREFORE, the Debtor asks this Court to grant relief in the form of order attached and to grant such other relief in their favor as may be necessary and proper under the law.

Date: April 17, 2024

CIBIK LAW, P.C.
Counsel for Debtor

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